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Attorneys for Plaintiff Memory Integrity, LLC

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON PORTLAND DIVISION

MEMORY INTEGRITY, LLC,

Plaintiff,

Case No. 3:15-cv-00262-SI

v.

INTEL CORPORATION,

Defendant.

JOINT MOTION TO EXTEND THE DEADLINE TO FILE A FINAL JOINT CLAIM CONSTRUCTION CHART

**JURY TRIAL DEMANDED** 

Plaintiff Memory Integrity, LLC ("MI" or "Plaintiff") and Defendant Intel Corporation ("Intel" or "Defendant"), by and through their respective counsel, respectfully submit this Joint Motion to Extend the Deadline to File a Final Joint Claim Construction Chart. In support, the parties state as follows:

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- 1. According to the current scheduling order in this case (Dkt Nos. 87, 88), the parties are due to file the Final Joint Claim Construction Chart on September 1, 2015. The parties seek a three day extension of this deadline, until and including September 4, 2015.
- 2. The parties have exchanged proposed claim constructions and supporting evidence and have met and conferred regarding the differences in the parties' proposals. The parties are presently continuing to discuss their proposed constructions with the goal of reducing the number of disputed claim terms to be construed and/or focusing the disputes to be resolved by the Court.
- 3. The parties do not seek to delay or alter any other deadlines in this case and do not believe this motion, if granted, would cause any such delay.

WHEREFORE, the parties respectfully request that the Court extend the time for submitting the parties' Final Joint Claim Construction Chart in the above-captioned case to September 4, 2015.

Dated: September 1, 2015

## /s/ Jonathan Baker

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Attorneys for Plaintiff Memory Integrity, LLC Respectfully submitted,

## /s/ Arthur W. Coviello

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## **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all interested parties.

Dated: September 1, 2015

/s/ Jonathan Baker

Jonathan Baker (appearing *pro hac vice*) Attorney for Plaintiff, Memory Integrity, LLC